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1	Amanda C. Yen (NSBN 9726)
	Kristen T. Gallagher (NSBN 9561)
2	McDONALD CARANO LLP
	2300 W. Sahara Ave, Suite 1200
3	Las Vegas, NV 89102
	Telephone: 702.873.4100
4	ayen@mcdonaldcarano.com
	kgallagher@mcdonaldcarano.com
5	
	David P. Shouvlin
6	PORTER WRIGHT MORRIS & ARTHUR LLP
	41 South High Street, Suite 2900
7	Columbus, OH 43215
	Telephone: 614.227.2045
8	dshouvlin@porterwright.com
	(admitted <i>pro hac vice</i>)
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Attorneys for Konecranes Global Corporation

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KONECRANES GLOBAL CORPORATION, Case No.: 2:18-cv-02015-GMN-NJK Plaintiff, STIPULATION AND ORDER FOR CATION OF BRIEFING SCHEDULE AND CLAIM VS. **CONSTRUCTION HEARING MATTERS** MODE TECH (Beijing) Co., Ltd., (ECF NO. 105) Defendant. (Third Request)

Pursuant to LR IA 6-1 and LPR 1-3, Plaintiff Konecranes Global Corporation ("Konecranes") and Defendant Mode Tech (Beijing) Co., Ltd. ("Mode Tech" and together, the "Parties") agree and respectfully request an additional five-week extension of Claim Construction briefing deadlines and a corresponding continuance of the Patent Tutorial and Claim Construction hearings (currently unscheduled) (ECF Nos. 98, 105), due to the continued travel-related concerns of counsel for the Parties in connection with the coronavirus (COVID-19) pandemic and related limitations. Specifically, the Parties' respective counsel have discussed and agreed to an approximate five-week extension of the Briefing Deadlines to allow the deposition of Konecranes' expert Emil Geiger to be re-scheduled from its current May 20, 2020 date for the same travel-related concerns. The Parties have correspondingly

¹ Mr. Geiger's deposition is scheduled to take place in Reno, Nevada.

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stipulated and agreed to extend Mode Tech's deadline to file its Claim Construction	n
Responsive Brief from June 3, 2020 to July 10, 2020 and Konecranes' deadline to	file its
Claim Construction Reply Brief from June 10, 2020 to July 17, 2020 (ECF No. 10	5).
Accordingly, the Parties respectfully request that the Court grant this Stipulation as	nd continue
the Patent Tutorial and Claim Construction hearings for approximately five addition	nal weeks
to a date convenient to the Court.	
In accordance with the Court's prior Order (ECF No. 105), the Parties shall	jointly file

a Notice with the Court upon completion of briefing on July 20, 2020, identifying three proposed dates for the Patent Tutorial and Claim Construction hearings for the Court's consideration and further coordination.

DATED this 15th day of May, 2020.

McDONALD CARANO LLP

By: /s/ Kristen T. Gallagher Amanda C. Yen (NSBN 9726) Kristen T. Gallagher (NSBN 9561) 2300 W. Sahara Avenue, Suite 1200 Las Vegas, NV 89102 Telephone: 702.873.4100

David P. Shouvlin PORTER WRIGHT MORRIS & ARTHUR LLP 41 South High Street, Suite 2900 Columbus, OH 43215 Telephone: 614.227.2045 dshouvlin@porterwright.com (admitted *pro hac vice*)

Attorneys for Konecranes Global Corporation

IT IS SO ORDERED.

Dated this 18 day of May, 2020.

Gloria M. Navarro, District Judge UNITED STATES DISTRICT COURT

BUETHER JOE & CARPENTER, LLC

By: /s/ Nicholas C. Kliewer Christopher M. Joe Kenneth P. Kula Brian A. Carpenter Nicholas C. Kliewer 1700 Pacific, Suite 4750 Dallas, TX 75201 Telephone: (214) 466-1272 chris.joe@bjciplaw.com ken.kula@bjciplaw.com brian.carpenter@bjciplaw.com nick.kliewer@ bjciplaw.com (admitted *pro hac vice*)

> Daniel T. Foley, Esq. Nevada Bar No. 1078 1210 S. Valley View Blvd. #208 Las Vegas, NV 89102 Telephone: (702) 384-2070 dan@foleyoakes.com

Attorneys for Mode Tech (Beijing) Co., Ltd.